



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 152-97-TV

Plant ID: 0459

Effective Date: 15 May 2002

Expiration Date: 31 May 2007

UTM Northing: 4230.7

UTM Easting: 602.6

SIC: 3087

NAICS: 325991

AFS: 00459

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

PolyOne
4200 Bells Lane
Louisville, Kentucky 40211

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Responsible Official: Paul H. Reger

Applicant for Permit: PolyOne

Title of Responsible Official: Plant Manager

Date Application Received: Initial - 21 February 1997; Revised Initial - 28 April 1999
Change of Ownership/Name: 1 September 2000

Date Application Administratively Complete: Initial - 18 April 1997; Revised Initial - 7 May 1999

Date Public Notice Given: Initial: 11 June 2000; Second: 28 January 2001

Reviewing Engineer (68)

Air Pollution Control Officer

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Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CAAA	- Clean Air Act Amendments (15 November 90)
CEMS	- Continuous Emission Monitoring System
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
l	- Liter
lbs	- Pounds
m	- Meter
MACT	- Maximum Achievable Control Technology
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
NSR	- New Source Review
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
UTM	- Universal Transverse Mercator

Permit No.: 152-97-TV

Plant ID: 0459

VOC - Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***
3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record Keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.
15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and

renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:
- Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745***
- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:
- US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***
36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

U-CMP Emission Unit Description: Compounding - Blending of resins and dry additives into powder compounds, some of which are extruded (or milled) into cubes or pellets.

U-CMP Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
6.09	Standards of Performance for Existing Process Operations	1 through 3; and 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5; and 7
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

District Only Enforceable Regulations		
Number	Subject	Sections
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
TK-1PLS	Tank TK-1PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-1PLS

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
TK-2PLS	Tank TK-2PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-2PLS
TK-3PLS	Tank TK-3PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-3PLS
TK-4PLS	Tank TK-4PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-4PLS
TK-20PLS	Tank TK-20PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-20PLS
TK-21PLS	Tank TK-21PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-21PLS
TK-22PLS	Tank TK-22PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-22PLS
TK-23PLS	Tank TK-23PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-23PLS
TK-24PLS	Tank TK-24PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-24PLS
TK-25PLS	Tank TK-25PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-25PLS
TK-26PLS	Tank TK-26PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-26PLS
TK-27PLS	Tank TK-27PLS	6.13, sec 3.3	VOC	Exempt-Vapor Pressure	NONE	N/A	N/A	TK-27PLS
TK-7K	Silo TK-7K	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-7K	Fabric Filter	SED-7K
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-11K	Silo TK-11K	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-11K	Fabric Filter	SED-11K
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-12K	Silo TK-12K	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-12K	Fabric Filter	SED-12K
		6.09, sec 3.1	Opacity	< 20%	MON			
SED-6K	Process Collector SED-6K	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	N/A	N/A	SED-6K
		7.08, sec 3.1.1	Opacity	< 20%	MON			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
SED-1K	Process Collector SED-1K	6.09, sec 3.2	PM	Regulatory Allowable	ONE	N/A	N/A	SED-1K
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-1K1	Silo TK-1K1	7.08, sec 3.1.2	PM	1.1 lbs/hr	ONE, MON	SED-1K1	Fabric Filter	SED-1K1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-2K1	Silo TK-2K1	7.08, sec 3.1.2	PM	1.1 lbs/hr	ONE, MON	SED-2K1	Fabric Filter	SED-2K1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-3K1	Silo TK-3K1	7.08, sec 3.1.2	PM	1.1 lbs/hr	ONE, MON	SED-3K1	Fabric Filter	SED-3K1
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-4K1	Silo TK-4K1	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-4K1	Fabric Filter	SED-4K1
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-9A	Tank TK-9A	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive
TK-10A	Tank TK-10A	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive
TK-7A	Tank TK-7A	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive
HPR-9A	Hopper HPR-9A	5.12, secs 1 and 5	TAP(s)	ASL	MOCS	N/A	N/A	Fugitive
		7.25, sec 2.1	VOC	See Comment 2	ONE			
HPR-1A	Hopper HPR-1A	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
TK-8K	Silo TK-8K	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-8K	Fabric Filter	SED-8K
		6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON			
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-5K1	Silo TK-5K1	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-5K1	Fabric Filter	SED-5K1
		6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON			
		6.09, sec 3.1	Opacity	< 20%	MON			
APS-1A	Air Pallet System APS-1A	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-3A	Process Collector SED-3A	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
SED-11B/ A	Dump Station SED- 11B/A	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-2A	Tank TK-2A	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-6A or CDC	Fabric Filter	SED-6A or CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON or ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-3A	Tank TK-3A	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-5A or CDC	Fabric Filter	SED-5A or CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON or ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-4A	Process Collector SED- 4A	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	N/A	N/A	SED-4A
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-5A	Tank TK-5A	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	N/A	N/A	TK-5A
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
TK-1A	Tank TK-1A	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-1A and SED-2A (Dual Parallel Controls)	Fabric Filters	SED-1A and SED-2A
		6.09, sec 3.1	Opacity	< 20%	MON			
APS-3A1	Air Pallet System APS- 3A1	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-10A	Dump Station SED-10A	5.12, secs 1 and 5	TAP(s)	BACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	2.34 lbs/hr	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-8A	Process Collector SED- 8A	5.12, secs 1 and 5	TAP(s)	BACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
APS-3A2	Air Pallet System APS- 3A2	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-9A	Process Collector SED-9A	5.12, secs 1 and 5	TAP(s)	BACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
MI-1A	Mixer MI-1A	5.11, secs 1 and 6	TAP(s)	TAL	MOCS	N/A	N/A	Fugitive
		6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE			
MI-2A	Mixer MI-2A	5.11, secs 1 and 6	TAP(s)	TAL	MOCS	N/A	N/A	Fugitive
		6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE			
HPR-6A	Hopper HPR-6A	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
FCM-1A	Mixer FCM-1A	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	BL-5A
CV-1A	Conveyor CV-1A	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	BL-5A
EXD-1A	Extruder EXD-1A	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	BL-5A
SED-7A	Process Collector SED-7A	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	SED-7A
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
HE-5A	Cooler HE-5A	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	SED-14A	Mechanical Collector	SED-14A
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
HE-6A	Cooler HE-6A	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	SED-14A	Mechanical Collector	SED-14A
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
TK-15A	Tank TK-15A	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	CDC	Fabric Filter	CDC
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
TK-13A	Silo TK-13A	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	SED-13A	Fabric Filter	SED-13A
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
TK-1K	Silo TK-1K	6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-4K	Fabric Filter	SED-4K
		6.09, sec 3.1	Opacity	< 20%	NONE			
TK-3K	Silo TK-3K	6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-3K	Fabric Filter	SED-3K
		6.09, sec 3.1	Opacity	< 20%	NONE			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
TK-5K	Silo TK-5K	6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-5K	Fabric Filter	SED-5K
		6.09, sec 3.1	Opacity	< 20%	NONE			
AVCS	A-Line Vacuum Cleaning System	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-MISCB	B-Line Miscellaneous Tank	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-MISCB	Fabric Filter	SED-MISCB
		6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON			
		6.09, sec 3.1	Opacity	< 20%	MON			
HPR-6B	Hopper HPR-6B	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
HPR-7B	Hopper HPR-7B	5.12, secs 1 and 5	TAP(s)	BACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-3B	Tank TK-3B	6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-3B	Fabric Filter	SED-3B
		6.09, sec 3.1	Opacity	< 20%	NONE			
HPR-9B	Hopper HPR-9B	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
TK-7B	Tank TK-7B	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-12B	Fabric Filter	SED-12B
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-8B	Tank TK-8B	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-13B	Fabric Filter	SED-13B
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-9B	Tank TK-9B	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-14B	Fabric Filter	SED-14B
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-2B	Process Collector SED- 2B	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	N/A	N/A	SED-2B
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
SED-11B	Dump Station SED-11B	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-4B	Tank TK-4B	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-4B	Fabric Filter	SED-4B
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-1B	Tank TK-1B	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-1B	Fabric Filter	SED-1B
		6.09, sec 3.1	Opacity	< 20%	MON			
BVCS	B-Line Vacuum Cleaning System	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
MI-1B	Mixer MI-1B	5.11, secs 1 and 6	TAP(s)	TAL and RACT	MOCS	N/A and CDC	N/A and Fabric filter	CDC
		6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	CDC	Fabric Filter	
		6.09, sec 3.1	Opacity	< 20%	MON			
		6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	
FE-3B	Feeder FE-3B	Included with MI-1B				Included with MI-1B		
FCM-1B	Mixer FCM-1B	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	ML-1B
CV-2B	Conveyor CV-2B	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	ML-1B
ML-1B	Mill ML-1B	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	ML-1B
TK-12B	Tank TK-12B	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
QAC-1B	Cooler QAC-1B	6.09, sec 3.2	PM	Regulatory Allowable	ONE	CDC	Fabric Filter	CDC
		6.09, sec 3.1	Opacity	< 20%	NONE			
SED-10B	Process Collector SED-10B	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	SED-16B	Fabric Filter	SED-16B
		7.08, sec 3.1.1	Opacity	< 20%	NONE			
SED-9B	Process Collector SED-9B	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	SED-16B	Fabric Filter	SED-16B
		7.08, sec 3.1.1	Opacity	< 20%	NONE			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
SED-17B	Process Separator SED-17B	6.09, sec 3.2	PM	Regulatory Allowable	ONE	N/A	N/A	SED-17B
		6.09, sec 3.1	Opacity	< 20%	NONE			
SCL-1D	Scale SCL-1D	5.11, secs 1 and 6	TAP(s)	TAL and RACT	MOCS	N/A	N/A	SCL-1D
		6.09, sec 3.2	PM	Regulatory Allowable	ONE			
		6.09, sec 3.1	Opacity	< 20%	MON			
SCL-3D	Scale SCL-3D	5.11, secs 1 and 6	TAP(s)	TAL and RACT	MOCS	N/A	N/A	SCL-3D
		6.09, sec 3.2	PM	Regulatory Allowable	ONE			
		6.09, sec 3.1	Opacity	< 20%	MON			
SCL-5D	Scale SCL-5D	5.11, secs 1 and 6	TAP(s)	TAL and RACT	MOCS	N/A	N/A	SCL-5D
		6.09, sec 3.2	PM	Regulatory Allowable	ONE			
		6.09, sec 3.1	Opacity	< 20%	MON			
SED-3D	Process Collector SED-3D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
APS-1D	Air Pallet System APS-1D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-1D	Process Collector SED-1D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	N/A	N/A	SED-1D
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
MI-1D	Mixer MI-1D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-2D	Fabric Filter	SED-2D
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TOTE-1D	Tote-1D	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-3D	Tank TK-3D	Included with MI-1D				Included with MI-1D		
TK-B10	Building 10 Tank TK-B10	6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-B10	Fabric Filter	N/A - vents indoors
		6.09, sec 3.1	Opacity	< 20%	NONE*			

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
HPR-2L	Hopper HPR-2L	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	CDC	Fabric Filter	CDC
		6.09, sec 3.1	Opacity	< 20%	MON			
TK-1L	Tank TK-1L	6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON	SED-1L	Fabric Filter	SED-1L
		6.09, sec 3.1	Opacity	< 20%	MON			
SED-3L	Process Collector SED-3L	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE	N/A	N/A	SED-3L
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-2L	Tank TK-2L	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
APS-1L	Air Pallet System APS-1L	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-17L	Process Collector SED-17L	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	N/A	N/A	SED-17L
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
ULS-1A	Supersack Unloading Station ULS-1A	5.12, secs 1 and 5	TAP(s)	BACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	1.1 lbs/hr	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
SED-10L	Process Collector SED-10L	5.12, secs 1 and 5	TAP(s)	BACT	MOCS	CDC	Fabric Filter	CDC
		7.08, sec 3.1.2	PM	1.1 lbs/hr	ONE			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-15L	Tank TK-15L	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-15L	Fabric Filter	SED-15L
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-14L	Tank TK-14L	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-14L	Fabric Filter	SED-14L
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-13L	Tank TK-13L	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-13L	Fabric Filter	SED-13L
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
TK-12L	Tank TK-12L	5.11, secs 1 and 6	TAP(s)	RACT	MOCS	SED-12L	Fabric Filter	SED-12L

U-CMP Emission Points								
ID ("E-CMP-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-CMP-"Prefix)
						ID ("C-CMP-" Prefix)	Type	
SED-11L	Process Collector SED-11L	7.08, sec 3.1.2	PM	Regulatory Allowable	ONE, MON	N/A	N/A	SED-11L
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		5.11, secs 1 and 6	TAP(s)	RACT	MOCS			
		7.08, sec 3.1.2	PM	Regulatory Allowable	ONE			
HPR-10L	Hopper HPR-10L	7.08, sec 3.1.1	Opacity	< 20%	MON	N/A	N/A	Fugitive
HPR-8L	Hopper HPR-8L	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	Fugitive
MI-1L	Mixer MI-1L	7.25, sec 2.1	VOC	See Comment 2	ONE	N/A	N/A	Fugitive
		5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON			
		6.09, sec 3.1	Opacity	< 20%	MON			
HPR-14LH	Hopper HPR-14LH	6.24, sec 3.3	VOC	450 lbs/hr and 3000 lbs/day	ONE	N/A	N/A	
		6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-14LH	Fabric Filter	SED-14LH
TK-2K	Tank TK-2K	6.09, sec 3.1	Opacity	< 20%	NONE			
		6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-2K	Fabric Filter	SED-2K
TK-4KL	Tank TK-4KL	6.09, sec 3.1	Opacity	< 20%	NONE			
		6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-4KL	Fabric Filter	SED-4KL
TK-5L	Tank TK-5L	6.09, sec 3.1	Opacity	< 20%	NONE			
		6.09, sec 3.2	PM	Regulatory Allowable	ONE	SED-5L	Fabric Filter	N/A - vents indoors
LBOX	L-Line Boxing/Bagging	6.09, sec 3.1	Opacity	< 20%	NONE*			
		6.09, sec 3.2	PM	Regulatory Allowable	ONE	CDC	Fabric Filter	CDC
LVCS	L-Line Vacuum Cleaning System	6.09, sec 3.1	Opacity	< 20%	NONE			
		5.11, secs 1 and 6	TAP(s)	RACT	MOCS	CDC	Fabric Filter	CDC
		6.09, sec 3.2	PM	Regulatory Allowable	ONE, MON			
		6.09, sec 3.1	Opacity	< 20%	MON			

Permit No.: 152-97-TV

Plant ID: 0459

[†]Compliance Monitoring Reference Codes: **MOCS** - Management of Change System, See Additional Conditions; **MON** - Parametric monitoring required, See Additional Conditions; **ONE** - One-time demonstration that limit cannot be exceeded; **NONE** - No Compliance Monitoring is required.

^{††} Regulations 5.11 and 5.12 are District only enforceable.

*Although this facility vents indoors, it is not exempt from permitting pursuant to Regulation 2.02, Section 2.3.21, as it has the potential to collect PM in a quantity greater than allowed for exemption.

U-CMP Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: See U-CMP Emission Points Table.
 - b. PM: See U-CMP Emission Points Table.
 - c. Opacity: See U-CMP Emission Points Table.
 - d. TAPs: See U-CMP Emission Points Table.
 - e. Control devices: the owner or operator shall maintain and operate all required control devices as identified in the U-CMP Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. PM: See Additional Condition 2.b.ii. Additionally, stack testing shall be performed on representative equipment once during the initial permit term at five locations approved by the District, each representing one of the five emission factors, to verify the control efficiencies and emission factors used in the one-time compliance demonstrations for PM. Said testing shall be conducted per the specifications of 40 CFR 60, Appendix A, Methods 1 through 5.
 - b. Opacity:
 - i. For each PM Emission Point subject to Regulation 6.09 (section 3.1) or 7.08 (section 3.1.1), and which does not require a control device (and having “MON” as the “Compliance Monitoring” column entry for the opacity line entry on the Emission Points Table), not cause or permit the discharge of emissions greater than or equal to 20% opacity (See Comments 4 and 5):
 - 1) The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point (stack) identified in the U-CMP Emission Points Table. No more than four Emission Points shall be observed simultaneously.
 - 2) For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
 - 3) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be

performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in Additional Condition 2.b.i.1.

- ii. For each PM Emission Point subject to Regulation 6.09 (section 3.1) or 7.08 (section 3.1.1), and having a required control device, not cause or permit the discharge of emissions greater than or equal to 20% opacity (See Comment 5):
 - 1) The owner or operator shall conduct a daily one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point (stack) identified in the U-CMP Emission Points Table. No more than four Emission Points shall be observed simultaneously.
 - 2) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance.
- c. TAPs:
 - i. Comply with Regulation 5.11 as follows:
 - 1) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.
 - 2) If a control device is required for compliance with Regulation 5.11, conduct daily visible emission surveys as described in Additional Condition 2.b.ii.
 - 3) Exempt from Regulation 5.11 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.
 - ii. Comply with Regulation 5.12 as follows:
 - 1) Conduct a compliance or ASL determination for each Regulation 5.12 pollutant or emission source, and for each modification, as defined in Regulation 5.12.
 - 2) Submit, if required, a BACT demonstration for each Regulation 5.12 TAP emission to the District.

- 3) Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.
- 4) If a control device is required for compliance with Regulation 5.12, conduct daily visible emission surveys as described in Additional Condition 2.b.ii.
- 5) Exempt from Regulation 5.12 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. PM: See Additional Condition 3.b.
- b. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given day, week, or month (as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
- c. TAPs: The owner or operator shall maintain records as indicated in the MOCS, making these available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall report semi-annually to the District the following:

- a. PM: See Additional Condition 4.b.
- b. Opacity:
 - i. Emission Unit ID number and Stack ID number;
 - ii. The beginning and ending date of the reporting period;
 - iii. The date, time, and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
 - iv. The date, time and results of each Method 9 or Method 22 conducted (or a negative declaration, if none); and
 - v. Description of any corrective action taken pursuant to Additional Conditions 2.b.i.3 and 2.b.ii.2.

5. **Raw Materials Use Flexibility:** PolyOne may change raw materials without prior notice or approval of APCDJC, so long as the change does not result in a violation of an allowable emission standard or limitation in its permit, or does not otherwise result in a mandatory review under NSR, NSPS or NESHAP provisions, Title V modification requirements, the standards of performance for TAP emissions pursuant to District Regulations 5.11 and 5.12, or any other requirement determined to be applicable to these emissions units.

U-CMP Comments/Explanations:

1. The source has demonstrated that its potential, VOC emissions are less than 450 pounds per hour and 3000 pounds per day for each facility (i.e., Emission Point) subject to Regulation 6.24 (section 3.3). Since this demonstration is based on uncontrolled VOC emissions, no monitoring, record keeping, or reporting are required.
2. The source has demonstrated its potential, source-wide, VOC emissions are less than five tons per year for facilities (i.e., Emission Points) subject to Regulation 7.25 (section 2.1). Since this demonstration is based on uncontrolled VOC emissions, no monitoring, record keeping, or reporting are required.
3. Additional Condition 2.c is for demonstrating compliance with Regulations 5.11 and 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
4. PM Emission Points handling *only* pellets or venting indoors (monitoring indicated as “NONE” for opacity line entries in the U-CMP Emission Points Table) are not required to perform opacity monitoring, record keeping, and reporting.
5. For PM Emission Points having an entry in the Control Device column *and* having an entry in the Compliance Monitoring column of “ONE” for PM (as opposed to “ONE, MON”), either one-time compliance demonstrations have been submitted by the source showing that the control devices are not required to meet the PM standard; or the control devices vent indoors (as noted in the Stack ID column) and any PM discharged indoors is handled by a vacuum system.

U-MS C Emission Unit Description: Air sparging/soil vapor extraction system and Solvent Metal Cleaning Equipment

U-MS C Applicable Regulations

Federally Enforceable Regulation		
Number	Subject	Sections
7.18	Standards of Performance for New Solvent Metal Cleaning Equipment	1 through 4
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

District Only Enforceable Regulations		
Number	Subject	Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-MS C Emission Points								
ID ("E-MS C-" Prefix)	Description	Applicable Regulation(s) ^{††}	Pollutant	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID ("S-MS C-" Prefix)
						ID ("C-MS C-" Prefix)	Type	
N/A	Solvent Metal Cleaning Equipment	7.18, sec 4	VOC	See AC 1.a.	MON	N/A	N/A	N/A
AS/SVE	Air Sparging/Soil Vapor Extraction (AS/SVE) System	5.12, secs 1 and 5	TAP(s)	ASL and TAL	MOCS	N/A	N/A	AS/SVE
		7.25, sec 2.1	VOC	See Comment 2.	ONE			

Permit No.: 152-97-TV

Plant ID: 0459

[†]Compliance Monitoring Reference Codes: **MOCS** - Management of Change System, See Additional Conditions; **MON** - Parametric monitoring required, See Additional Conditions; **ONE** - One-time demonstration that limit cannot be exceeded.

^{††} Regulations 5.11 and 5.12 are District only enforceable.

U-MSD Additional Conditions:**1. Standards** (Regulation 2.16, section 4.1.1)

- a. VOC: See Emission Points Table. Additionally, for the solvent metal cleaning equipment:
 - i. The cleaner shall be equipped with a cover. If the VOC volatility is greater than 15 mm Hg measured at 100°F or if the VOC is agitated or heated, then the cover shall be designed so that it can be easily operated with one hand.
 - ii. The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner. If the VOC volatility is greater than 32 mm Hg measured at 100°F, then the drainage facility shall be internal so that parts are enclosed under the cover while draining. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system.
 - iii. A permanent, conspicuous label summarizing the operating requirements in Additional Condition 1.a.vi shall be installed on or near the cleaner.
 - iv. If used, the VOC spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing.
 - v. If the VOC volatility is greater than 32 mm Hg measured at 100°F or if the VOC is heated above 120°F, then one of the following control devices shall be used:
 - a) Freeboard that gives a freeboard ratio equal to or greater than 0.7;
 - b) Water cover (VOC must be insoluble in and heavier than water); or
 - c) Other systems of equivalent control, such as a refrigerated chiller or carbon absorption.
 - vi. Operating Requirements

- a) Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers.
- b) Close degreaser cover whenever not handling a part in the cleaner.
- c) Drain cleaned parts until dripping ceases (15 seconds is usually necessary).
- d) Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

b. TAPs: See U-MSC Emission Point Table.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

- a. VOC: The owner or operator shall conduct monthly inspections to verify ongoing compliance with the control and operational requirements specified in Additional Condition 1.a.
- b. TAPs: The owner or operator shall comply with Regulation 5.12 as follows:
 - i. Conduct a compliance or ASL determination for each Regulation 5.12 pollutant or emission source, and for each modification, as defined in Regulation 5.12.
 - ii. Submit, if required, a BACT demonstration for each Regulation 5.12 TAP emission to the District.
 - iii. Maintain a MOCS, as approved by the District, to evaluate and document modifications, as defined in Regulation 5.12.
 - iv. Exempt from Regulation 5.12 any specific pollutant(s) governed by a MACT Standard that is or becomes applicable.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: The owner or operator shall maintain records that include the following for each purchase:

- i. The name and address of the solvent supplier;
 - ii. The date of the purchase;
 - iii. The type of the solvent; and
 - iv. The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
 - v. Additionally, the owner or operator shall maintain records of the results of the inspection requirement specified in Additional Condition 2.a.
- b. TAPs: The owner or operator shall maintain records as indicated in the MOCS, making these available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report semi-annually to the District the following:
- a. VOC: No reporting required.
 - b. TAPs: No reporting required.

U-MSR Comments/Explanations:

- 1. Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
- 2. The source has demonstrated its *potential, uncontrolled source-wide*, VOC emissions are less than five tons per year for facilities (i.e., Emission Points) subject to Regulation 7.25 (section 2.1).

Source-wide TAP Emissions Limits		
TAP	Regulation	Allowable Emissions (lbs/hr)
Antimony Compounds	5.11	2.767
1,1-Dichloroethane	5.12	3,295
1,2-Dichloroethylene	5.12	3,214
Titanium Dioxide	5.11	27.667
Toluene	5.11	5,016.30
Trichloroethylene	5.12	1,098

The above emission limits are for Regulations 5.11 and 5.12 only and are District only enforceable. Additional emission limits for the same pollutants are imposed by other regulations, and the more stringent limit applies.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-permit Documents

<u>Document</u>	<u>Date</u>
MOCS, EV-31, Revision 0.0	31 August 2001

Alternative Operating Scenarios

The source did request to operate under alternative operating scenarios in its revised initial Title V Permit Application for raw materials use and equipment flexibility use; however, the District has determined these do not fit the definition of an Alternative Operating Scenario, an option by which a company has defined a *specific*, alternative mode of operation. Nonetheless, this language has been incorporated in the source's Title V Permit to accommodate the source's wish for operational flexibility.

Source-wide HAP Speciation			
HAP	CAS No.	HAP	CAS No.
Antimony Compounds	N/A	Lead Compounds (Excluding Elemental Lead)	N/A
Arsenic Compounds (Inorganic, Including Arsine)	N/A	Methyl Chloroform (1,1,1-Trichloroethane)	71-55-6
Bis(2-Ethylhexyl) Phthalate (DEHP)	117-81-7	Nickel Compounds	N/A
Carbon Tetrachloride	56-23-5	Toluene	108-88-3
Chloroform	67-66-3	1,1,2-Trichloroethane	79-00-5
Chromium Compounds	N/A	Trichloroethylene	79-01-6

Ethylene Dichloride	107-06-2	Vinyl Chloride	75-01-4
Glycol Ethers	N/A	Vinylidene Chloride (1,1-Dichloroethylene)	75-35-4
Ethylidene Dichloride (1,1-Dichloroethane)	75-34-3	This space intentionally left blank.	

Note: HAPs cited in the table above are those currently known to be found at this plant and is for informational purposes only. See U-CMP Additional Condition 5.

Insignificant Activities		
Description	Quantity	Basis
Emergency Relief Vents or Ventilating Systems not otherwise regulated	Various	Regulation 2.02, section 2.3.10
Indoor PM Collectors Venting Indoors (Non 5.11, 5.12, or 5.14 Regulated /Material)	Various	Regulation 2.02, section 2.3.21
Miscellaneous Drums and Totes	Various	No known underlying applicable requirement.
Miscellaneous PM Containers/Equipment	Various	No known regulated emissions to the atmosphere.
Internal Combustion Engines, Fixed or Mobile	Various	Regulation 2.02, section 2.2
Brazing, Soldering, or Welding Equipment	Various	Regulation 2.02, section 2.3.4
Lab Ventilating and Exhausting Systems, Non-radioactive Materials	Various	Regulation 2.02, section 2.3.11
Soil or Groundwater Contamination Remediation, Passive or Total Removal	As needed	Regulation 2.02, section 2.3.20
Diesel Fuel Storage Tanks	Various	Regulation 2.02, section 2.3.25

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a < 20% opacity limit for facilities not otherwise regulated.
 - b. No periodic monitoring shall be required for facilities designated as insignificant activities.